

Message

From: Lisa Rector [lrector@nescaum.org]
Sent: 3/4/2020 12:10:21 PM
To: Johnson, Steffan [johnson.steffan@epa.gov]
Subject: RE: Pellet fueled hydronic heater testing

Thanks Stef! Do you know who is the lead for this work – Rochelle or Chuck?

From: Johnson, Steffan <johnson.steffan@epa.gov>
Sent: Wednesday, March 4, 2020 7:09 AM
To: Lisa Rector <lrector@nescaum.org>
Subject: RE: Pellet fueled hydronic heater testing

Lisa,

My understanding is that it does not involve notice and comment. These are not handled in my group, but are typically handled by the rule writer in concert with OECA, and our attorney's (review).

My guess is that subpart AAA is a key to where this shakes out. But I am not the 'decider'.

Stef

From: Lisa Rector <lrector@nescaum.org>
Sent: Wednesday, March 4, 2020 7:04 AM
To: Johnson, Steffan <johnson.steffan@epa.gov>
Subject: RE: Pellet fueled hydronic heater testing

Is a regulatory interpretation different than an applicability determination? If so, will there be any notice and comment on this determination?

From: Johnson, Steffan <johnson.steffan@epa.gov>
Sent: Wednesday, March 4, 2020 6:57 AM
To: Lisa Rector <lrector@nescaum.org>
Subject: RE: Pellet fueled hydronic heater testing

Lisa,

Subpart AAA groups pellet stoves with crib fueled appliances.

So that standard is not ambiguous like QQQQ.

Stef

From: Lisa Rector <lrector@nescaum.org>
Sent: Tuesday, March 3, 2020 5:14 PM
To: Johnson, Steffan <johnson.steffan@epa.gov>
Subject: Pellet fueled hydronic heater testing

Stef, I had this email forwarded to me does this mean you are also considering the level of the standard for pellet stoves?

----- Original Message -----

Subject: Pellet fueled hydronic heater testing

From: "Johnson, Steffan" <johnson.steffan@epa.gov>

Date: 3/3/20 4:40 pm

To: "Alex Tiegs" <atiegs@omni-test.com>, "brian.brunson@intertek.com" <brian.brunson@intertek.com>, "brian.ziegler@intertek.com" <brian.ziegler@intertek.com>, "claude.pelland@intertek.com" <claude.pelland@intertek.com>, "dpower@polytests.com" <dpower@polytests.com>, "dvoracek@szutest.cz" <dvoracek@szutest.cz>, "gpiedalue@polytests.com" <gpiedalue@polytests.com>, "Henrik Persson" <henrik.persson@ri.se>, "Jes Andersen" <jsa@teknologisk.dk>, "John Steinert" <john.steinert@pfsteco.com>, "Kelli OBrian" <kelli@clearstak.com>, "lennart.aronsson@sp.se" <lennart.aronsson@sp.se>, "myren.ben@gmail.com" <myren.ben@gmail.com>

Cc: "Boyd, Rochelle" <Boyd.Rochelle@epa.gov>, "French, Chuck" <French.Chuck@epa.gov>, "Sanchez, Rafael" <Sanchez.Rafael@epa.gov>, "Scinta, Robert" <scinta.robert@epa.gov>, "Toney, Mike" <Toney.Mike@epa.gov>, "Baumgart-Getz, Adam" <Baumgart-Getz.Adam@epa.gov>, "Aldridge, Amanda" <Aldridge.Amanda@epa.gov>, "Lowe, Theresa" <Lowe.Theresa@epa.gov>, "Lessard, Patrick" <Lessard.Patrick@epa.gov>

Dear EPA Approved Wood Burning Appliance Test Laboratory,

We have recently discovered that 40 CFR 60 Subpart QQQQ (Hydronic heaters and Forced Air Furnaces) is missing a key element with respect to which standard (crib fuel in 60.5474(b)(2) or cord fuel in 60.5474(b)(3)) a pellet fueled appliance should target when doing compliance testing in order to meet the 2020 standard. Certainly this makes a difference as the crib fuel requirement of 0.10 lb/Mmbtu is lower than the cord wood fuel requirement of 0.15 lb/Mmbtu.

EPA will undergo a process called a Regulatory Interpretation to formally resolve this situation. In the meanwhile, if you have clients who seek to comply with this standard, the safe bet is to target the lowest number and meet both standards.

I encourage you to reach out to Dr. Rafael Sanchez or Ms. Rochelle Boyd *(copied on this e-mail) if you have questions about the emissions standard.

Mike Toney and myself are here to answer any questions you may have about test methods with respect to compliance with this or any other standard.

EPA will follow up with you to share the formal Regulatory Interpretation once that is complete.

Very sincerely,

Stef Johnson

Steffan M Johnson | Leader – Measurement Technology Group | US EPA Office of Air Quality Planning and Standards | Air Quality Assessment Division | 109 T.W. Alexander Drive, RTP, NC 27710 | Mail Drop: E-143-02 | Phone: (919) 541-4790 | Cell: (919) 698-5096